

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

ZOHO CORPORATION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 1:22-CV-00037-ADA
	§	
LIBERTY PEAK VENTURES, LLC,	§	
	§	
Defendant.	§	
	§	
	§	
LIBERTY PEAK VENTURES, LLC,	§	
	§	
Counterclaimant,	§	
	§	
v.	§	
	§	
ZOHO CORPORATION,	§	
	§	
Counter-Defendant,	§	
	§	
and	§	
	§	
ZOHO CORPORATION PVT. LTD.	§	
	§	
Third-Party Defendant.	§	
	§	

**JOINT CLAIM CONSTRUCTION STATEMENT**

Plaintiff Zoho Corporation, Third-Party Defendant Zoho Corporation Pvt., Ltd., and Defendant and Counter-Claimant Liberty Peak Ventures, LLC jointly submit this Joint Claim Construction Statement for disputed claim terms of three patents that Liberty Peak Ventures asserts Zoho infringes: (1) U.S. Patent No. 9,373,122 (“’122 patent”); (2) U.S. Patent No. 10,074,088 (“’088 patent”); and (3) U.S. Patent No. 10,956,901 (“’901 patent”).

## I. AGREED CONSTRUCTIONS

Term	Agreed Construction
<b>“web service”</b> ’122 Claims 1, 2, 5, 6, 15, 16 ’901 Claims 1, 11, 16, 17 ’088 Claims 1, 15, 19, 20  This term was proposed by Zoho.	“one or more software components, hardware components, or any combination thereof, associated with providing, receiving, and/or interfacing with data over a network”
<b>“browser toolbar”</b> ’122 Claims 1-3, 6, 7, 15, 16 ’901 Claims 1, 8, 9, 11, 16, 18, 19 ’088 Claims 1, 5, 6, 15, 20  This term was jointly proposed for construction.	“a software program that adds functionality to a browser and includes a graphical user interface component within the browser”

## II. DISPUTED CLAIM TERMS

Term	LPV Construction	Zoho Construction
<b>“account information”</b> ’122 Claims 1, 3, 6, 15 ’901 Claims 1, 4, 8, 9, 11, 14, 16, 18, 19 ’088 Claims 1, 5, 15, 20  This term was proposed by Zoho.	Plain and ordinary meaning – no need for construction.	“information from an account (e.g., an account number) wherein the account is associated with an open account or closed account system”  “an open account system is one that enables transactions with different merchants. Credit

Term	LPV Construction	Zoho Construction
		cards such as Visa and American Express are examples of open accounts. Closed accounts, by contrast, may be restricted to use with a particular store/merchant, a particular chain of stores/merchants or a collection of affiliated stores/merchants.”
<p><b>“encryption key”</b>  ’122 Claims 1, 7, 15</p> <p>This term was proposed by Zoho.</p>	<p>Plain and ordinary meaning – no need for construction.</p>	<p>“a private key that corresponds to a public key”</p>
<p><b>“cryptographic key”</b>  ’901 Claims 1, 4, 11, 14  ’088 Claims 1, 15</p> <p>This term was proposed by Zoho.</p>	<p>Plain and ordinary meaning – no need for construction.</p>	<p>“a private key that corresponds to a public key”</p>
<p><b>“securely storing the account information at the browser toolbar”</b>  ’122 Claim 1</p> <p>This term was proposed by Zoho.</p>	<p>Plain and ordinary meaning – no need for construction, or in the alternative:</p> <p>“storing the account information in a data storage implementation wherein the stored account information is securely accessible by the browser toolbar”</p>	<p>Indefinite, or in the alternative:</p> <p>“storing the account information in a data storage implementation wherein the stored account information is accessible only by the browser toolbar”</p>
<p><b>“securely storing, by the browser toolbar, the account information at the browser toolbar”</b>  ’901 Claims 1, 11  ’088 Claim 1</p> <p>This term was proposed by Zoho.</p>	<p>Plain and ordinary meaning – no need for construction, or in the alternative:</p> <p>“storing, by the browser toolbar, the account information in a data storage implementation wherein the stored account information is securely accessible by the browser toolbar”</p>	<p>Indefinite, or in the alternative:</p> <p>“storing, by the browser toolbar, the account information in a data storage implementation wherein the stored account information is accessible only by the browser toolbar”</p>

Term	LPV Construction	Zoho Construction
<p><b>“generating, via the browser toolbar”</b></p> <p>’122 Claim 7</p> <p>This term was proposed by Zoho.</p>	<p>Plain and ordinary meaning – no need for construction.</p>	<p>Indefinite</p>
<p><b>“generating, at a browser toolbar”</b></p> <p>’901 Claims 1, 11 ’088 Claim 1</p> <p>This term was proposed by Zoho.</p>	<p>Plain and ordinary meaning – no need for construction.</p>	<p>Indefinite</p>
<p><b>“determining, at a browser toolbar”</b></p> <p>’122 Claim 15 ’088 Claim 15</p> <p>This term was proposed by Zoho.</p>	<p>Plain and ordinary meaning – no need for construction.</p>	<p>Indefinite</p>
<p><b>“decrypting, at the browser toolbar”</b></p> <p>’122 Claim 15</p> <p>This term was proposed by Zoho.</p>	<p>Plain and ordinary meaning – no need for construction.</p>	<p>Indefinite</p>
<p><b>“providing, via the browser toolbar, the stored account information to the web service”</b></p> <p>’122 Claim 6</p> <p>This term was proposed by Zoho.</p>	<p>Plain and ordinary meaning – no need for construction.</p>	<p>Indefinite</p>

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Dated: June 30, 2023

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing is being served on the counsel of record via the CM/ECF system on June 30, 2023.

By: /s/ Phillip J. Haack  
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